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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**ANGELA M. FLAHERTY,**

Defendant.

**Case Number: L:24-PO-00967-SAH**

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**UNITED STATES MOTION FOR STIPULATED PROTECTIVE ORDER**

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The United States, by and through its attorney, Ariel C. Calmes, Assistant United States Attorney for the District of Wyoming, hereby moves the Court to approve a Stipulated Protective Order requiring that the following restrictions shall apply to the discovery that the United States produces and designates as “Protected Material” in order to expedite the timely flow of discovery material/to prevent witness tampering/to secure confidential information.

1. The following individuals (the “Defense Team”) may access and examine the Protected Material under the conditions set forth herein for the sole purpose of preparing the defense, including sentencing and appeal, and for no other purpose:

- a. counsel for the Defendant;
- b. the Defendant, but only in the presence of counsel for the Defendant or an

investigator or paralegal assisting defense counsel;

- c. persons who provide litigation support services to defense counsel;
- d. any expert retained on behalf of the Defendant to assist in the defense of this matter; and
- e. any investigator retained on behalf of the Defendant to assist in the defense of this matter.

Counsel for the Defendant shall advise the individuals on the Defense Team of the requirements and the restrictions in the Protective Order, as well as the Court's entry of the Protective Order. Counsel for the Defendant must provide a copy of the Protective Order to any member of the Defense Team who accesses or examines the Protected Material. Counsel for the Defendant must obtain the signature of any member of the Defense Team who accesses or examines the Protected Material acknowledging they have been provided a copy of the Protective Order and agree to abide by its terms.

2. The Defense Team shall not permit other persons access of any kind to the Protected Material. The one exception is that the Defense Team may permit other persons to review the Protected Material if all of the following conditions are met:

- a. the Defense Team maintains custody of the Protected Material at all times;
- b. the Defense Team is present during the review; and
- c. the review is for the sole purpose of preparing the defense and for no other purpose.

3. The Defense Team will maintain the Protected Material in a secure location (e.g., locked drawer, cabinet, or safe) or secure electronic device (e.g., password-protected computer, password-protected thumb drive, password-protected external hard drive). Further, the Defense

Team will maintain a copy of the Protective Order with the Protected Material at all times.

4. The Defense Team shall not publicly offer, file, or lodge any Protected Material unless:

- a. the United States provides written concurrence;
- b. it is done pursuant to further Court order; or
- c. it is done under seal.

5. Any willful violation of the Protective Order shall constitute a criminal contempt of Court for which sanctions are provided by law.

6. The Defense Team may make up to two physical copies of the Protected Material without prior approval of the United States. Two weeks before trial, the Defense Team may make additional copies of the Protected Material in preparation for trial without the prior approval of the United States. These copies must be maintained as described in paragraph 3 by the Defense Team as defined in paragraph 1a, 1c, 1d, and 1e. The Defendant shall not be provided a copy of the Protected Material, but the Defendant may examine it pursuant to paragraph 1. The Protective Order shall remain in effect until the Defense Team returns the Protected Material (and any copies) to the United States. The Defense Team shall return the Protected Material (and any copies) to the United States within 30 days of the entry of judgment on all charges, unless a direct appeal is filed, in which case the Defense Team shall complete the return of the Protected Material to the United States within 30 days of the date when the direct appeal is finally determined.

7. If the Protected Material is produced electronically, this Protective Order shall remain in effect until the Defense Team destroys the Protected Material. If the Protected Material is on a disk, then the disk shall be shredded. If the Protected Material is stored on a thumb drive or external hard drive, then the storage device shall be properly formatted to adequately destroy

the stored data. The Defense Team shall notify the United States that the Protected Material has been destroyed.

8. The Defense Team shall not provide, disseminate, or otherwise distribute any personally identifying information, including addresses, social security numbers, driver's license numbers, or other sensitive information, for any reason, without order of the Court permitting distribution of that information. The Defense Team shall also not use any of that personally identifying information for any benefit or any purpose other than legitimate defense purposes in this case.

9. The parties shall meet and confer regarding any disputes arising under this Joint Motion and the corresponding Stipulated Protective Order. The parties in this case have negotiated this Joint Motion, which does not constitute a concession or waiver by either party regarding discovery procedures generally in this case or in any other or future case.

WHEREFORE, the United States moves the Court to grant the Motion for Stipulated Protective Order.

DATED this 3<sup>rd</sup> day of December 2024.

ERIC HEIMANN  
Acting United States Attorney

By: /s/ Ariel C. Calmes  
ARIEL C. CALMES  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that on this 3<sup>rd</sup> day of December 2024 the foregoing was electronically filed and served upon the Defendant via CM/ECF.

/s/ Amanda R. Hudson  
UNITED STATES ATTORNEY'S OFFICE